1	CHRISTENSEN JAMES & MARTIN				
2	KEVIN B. CHRISTENSEN, ESQ. (175) WESLEY J. SMITH, ESQ. (11871) 7440 W. Sahara Avenue				
3	Las Vegas, Nevada 89117 Telephone: (702) 255-1718				
4	Facsimile: (702) 255-0871 kbc@cjmlv.com, wes@cjmlv.com				
5	Attorneys for Plaintiff				
6	UNITED STATES DISTRICT COURT				
7	DISTRICT OF NEVADA				
8	* * *	· * *			
9 10	THE BOARD OF TRUSTEES OF THE SOUTHERN NEVADA GLAZIERS AND FABRICATORS PENSION TRUST FUND,	CASE NO.: 2:15-cv-01998-GMN-GWF			
11	Plaintiff,	STIPULATION AND ORDER TO STAY CASE AS AGAINST			
12	VS.	AMERICAN CONTRACTORS INDEMNITY COMPANY			
13	HEINAMAN CONTRACT GLAZING, INC.,				
14	a California corporation; JOHN L. HEINAMAN, an individual; AMERICAN	Date: N/A			
15	CONTRACTORS INDEMNITY COMPANY, a California corporation; JOHN	Time: N/A			
16	DOES I-XX, inclusive; and ROE ENTITIES I-XX, inclusive,				
17	Defendants.				
18	IT IS HEREBY STIPULATED AND AGREED between Plaintiff THE BOARD OF				
19	TRUSTEES OF THE SOUTHERN NEVADA GLAZIERS AND FABRICATORS PENSION				
20	TRUST FUND ("Plaintiff" or "Trust") and Defendant AMERICAN CONTRACTORS				
21	INDEMNITY COMPANY ("Defendant" or "ACIC"), as follows:				
22	1. ACIC acknowledges that it was served with a copy of the Summons and				
23	Complaint in this action on October 26, 2015;				
24	2. By agreement with the Plaintiff, ACIC has not yet filed an answer, responsive				
25 26	pleading, or otherwise appeared in this action;				
20 27					
- '					

1	3.	ACIC acknowledges that a Judgment by Confession ("Judgment") will be entered	
2	against its bond principal, Heinaman Contract Glazing, Inc., in favor of the Plaintiff;		
3	4.	ACIC also acknowledges that Plaintiff has agreed to stay enforcement and	
4	execution on	the Judgment for a period of time, pursuant to the terms of the Judgment	
5	("Execution Stay");		
6	5.	The claims against ACIC shall be stayed for a period equal to the Execution Stay	
7	and ACIC shall have no obligation to appear, answer or otherwise respond to the Complain		
8	while the Execution Stay is in effect;		
9	6.	ACIC reserves all rights, claims, and defenses in this action.	
10	7.	Plaintiff will provide ACIC with Notice in the event that the Execution Stay	
11	expires or is otherwise lifted; and		
12	8.	ACIC shall have twenty one (21) days to file an answer or other response to the	
13	Complaint following Notice from the Plaintiff that the Execution Stay has expired or has been		
14	otherwise lifted.		
15		<u>ORDER</u>	
16	Good cause appearing, IT IS SO ORDERED.		
17			
18	DATED and done this 1 day of February 2016.		
19			
20			
21	UNITED STATES DISTRICT COURT JUDGE		
22			
23			
24		[PARTY SIGNATURES FOLLOW]	
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	1	Dated: January, 2016.	Dated: January <u>//</u> , 2016.
	2	CHRISTENSEN JAMES & MARTIN	AMERICAN CONTRACTORS INDEMNITY COMPANY
	3	By: Wasley I Smith Esq	By: Yhette Nunez
	4	Wesley J. Smith, Esq. Attorneys for Plaintiff Southern Nevada Glaziers & Fabricators Pension Trust	Ivette Nuñez
	5	Glaziers & Fabricators Fension Trust	Bond Claims Litigation Representative On Behalf of American Contractors
	6		Indemnity Company 601 S. Figueroa Street Suite 1600
	7		Los Angeles, CA 90017-5721 Telephone: (310) 649-0990 Ext 1132
	8		Email: inunez@hccsurety.com
7440 West Sahara Ave., Las Vegas, Nevada 89117 Ph: (702) 255-1718 § Fax: (702) 255-0871	9		
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CHRISTENSEN JAMES & MARTIN

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Dated: January 1, 2016. Dated: January ____, 2016. CHRISTENSEN JAMES & MARTIN AMERICAN CONTRACTORS INDEMNITY 2 **COMPANY** 3 By: Wesley J. Smith, Esq. Attorneys for Plaintiff Southern Nevada Ivette Nuñez 4 Glaziers & Fabricators Pension Trust Bond Claims Litigation Representative 5 On Behalf of American Contractors Indemnity Company 6 601 S. Figueroa Street Suite 1600 Los Angeles, CA 90017-5721 7 Telephone: (310) 649-0990 Ext 1132 8 Email: inunez@hccsurety.com 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

7440 West Sahara Ave., Las Vegas, Nevada 89117

CHRISTENSEN JAMES & MARTIN

PH: (702) 255-1718 § FAX: (702) 255-0871